

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE THE  
OPINIONS OF ZIRUI SONG, M.D., PH.D.**

**PLEASE TAKE NOTICE** that on July 5, 2022, or as soon thereafter as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants named below, shall move for an entry of Order excluding the opinions of Plaintiffs' expert, Zirui Song, M.D., Ph.D., pursuant to Federal Rules of Evidence 104, 702, and 703.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter, and the Certification of Clem C. Trischler, Esq. together with exhibits; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: May 3, 2022

Respectfully Submitted:

By: /s/ Clem. C. Trischler  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 3, 2022, a copy of the foregoing document was served on all counsel of record via CM/ECF.

By: /s/ Clem. C. Trischler  
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